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March 29, 2024

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. James M. Wicks, U.S.M.J.
100 Federal Plaza, Courtroom 1020
Central Islip, NY 11722-4438

Re: Superb Motors Inc., et al. v. Deo, et al.

Case No.: 2:23-cv-6188 (JMW)

Dear Judge Wicks:

The undersigned together represent all of the Plaintiffs in the above-referenced case.

Plaintiffs respectfully submit this reply in further support of their request for leave to submit their memorandum of law in opposition to the four (4) sets of motions to dismiss filed by all Defendants (except for Flushing Bank) with up to five (5) pages in excess of the sixty (60) page limit set by this Court.

Defendants argue that Plaintiffs should be required to file a separate brief in opposition to each of the four (4) motions to dismiss. This argument must be rejected because this Court already ordered Plaintiffs to file one (1) omnibus brief in opposition to all four (4) motions.

Moreover, in their omnibus brief, Plaintiffs are not only opposing four (4) separate motions to dismiss, but they are also filing a cross-motion to amend the Complaint, which cross-motion will be included within the omnibus brief.

Accordingly, Plaintiffs respectfully request that their motion to file five (5) excess pages be granted.

Respectfully submitted,

MILMAN LABUDA LAW GROUP PLLC

/s/ Jamie S. Felsen, Esq.

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

CYRULI SHANKS & ZIZMOR LLP

/s/ Jeffrey Ruderman, Esq.